

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF H.B.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, H.B., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I live in Lake Tapps, Washington with my wife and three children. I am employed  
5 as a nurse practitioner and my wife is employed in information technology.

6 3. My children are agender, transgender, and genderfluid. I have chosen to use my  
7 initials and refer to my children in this declaration as “Child A,” “Child B,” and “Child C”  
8 because I am fearful for their and our family’s safety and privacy in the current political climate.

9 4. Child A is currently 19 years old and attends community college. When they were  
10 born, they were designated female on their birth certificate, but their gender identity is agender.  
11 Child B is currently 17 years old and is in high school. When they were born, they were  
12 designated male on their birth certificate, but their gender identity is transgender female. Child C  
13 is currently 13 years old and is in middle school. When they were born, they were assigned  
14 female at birth, but their gender identity is genderfluid.

15 5. Child A is a sweet, gentle person who cares about the wellbeing of everyone. She  
16 loves animals and being outdoors. She likes to make jewelry and is learning German. Child A  
17 receives gender affirming hormone therapy through her primary care provider, which she started  
18 in 2020. Suppressing menstrual periods has reduced her body dysmorphia, anxiety, and  
19 depression. She is considering top surgery at some point, and may possibly pursue other forms  
20 of gender affirming care when it is right for her.

21 6. Child B is a sensitive, kind person. She loves working with spreadsheets, playing  
22 video and board games, and spending time with family. Over the past few years, I noticed Child  
23 B was mildly depressed and withdrawing from most aspects of life. In early May 2024, I received  
24 a text from Child B that stated, “Mom, I’m trans.” I cried upon receiving this message, not  
25 because I was upset that Child B is trans, but because the world is so unkind to transgender  
26 people, and I don’t want that for my children. I don’t want people to target them for something

1 that is arbitrary and too often misunderstood. Child B had a difficult time expressing herself  
2 regarding her gender identity, so we had many open conversations about this. Child B decided  
3 that they wanted to explore gender-affirming care. We first got new clothes that felt right to her  
4 and talked openly about how she wanted to express herself. It took several conversations for her  
5 to express what gender identity meant to her, how she wanted to present herself, and what  
6 changes she was interested in pursuing. When asked what this means to her, Child B told me she  
7 had done research on estrogen therapy and felt this was the proper course to take that aligned  
8 with her gender identity. I contacted our pediatrician, who referred Child B to a gender affirming  
9 specialist at Seattle Children's Hospital, where she had her first appointment in summer 2024.  
10 In October 2024, Child B began puberty blockers and started estrogen a few weeks later. It was  
11 amazing to see that she was suddenly less withdrawn, more willing to experience the world, go  
12 places, and interact with people. Child B was interested in social interactions where she had not  
13 been for ten years prior. After coming out, Child B's countenance was much brighter, and this  
14 was a small step to becoming who she really is. She is so much happier and more full of life  
15 since receiving gender-affirming care. Child B has more goals and ambitions now, whereas,  
16 before coming out, she hid who she really was, including her aspirations. Our relationship is  
17 much stronger and closer now. It's a beautiful thing to see Child B flourish.

18 7. Child C is very talented musically and artistically. They love playing the trumpet  
19 and French horn in band, singing in choir, and expressing themselves through art. Child C came  
20 out as genderfluid in June 2024. They currently use he/they pronouns and present as more gender  
21 ambiguous. Child C saw their medical provider in July 2024 and were referred to Seattle  
22 Children's Hospital. They started seeing their social worker in October 2024, and were seen by  
23 their medical provider in December 2024. They are starting puberty blockers soon but are  
24 waiting on a pre-authorization from insurance. Coming out and receiving gender-affirming care  
25 has made Child C so happy with themselves and they are finding stronger friendships with their  
26 peers.

1           8.       My family decided to seek out gender-affirming care for our children for two  
2 main reasons: my background as a pediatric mental health provider and knowing trans people  
3 who are good people who assert “this is who I am.” Understanding how much gender-affirming  
4 care impacts mental health is so critical to letting people be who they are. Gender-affirming care  
5 is mental health care – it is suicide prevention. Trans people are not the villains that some media  
6 portray them to be. They are friends, family, and coworkers. They helped me to understand that  
7 the cultural messages I received about trans people growing up bear no resemblance to the truth.  
8 Having those experiences prepared me to listen to my children when they felt ready to tell me  
9 who they are. Gender-affirming care is the safest thing for my children’s mental health and their  
10 overall well-being.

11           9.       Transgender children are being unfairly targeted, discriminated against, and are  
12 being prevented from accessing the evidence-based gender-affirming care they need. If my  
13 children were no longer able to access this care from their current providers, they would be  
14 immediately harmed. This Executive Order has impacted my children in a big way. It goes  
15 against the 9<sup>th</sup> Amendment and sends a message that their rights do not matter. The Executive  
16 Order encourages transphobia. My children are aware that many Americans hate trans people  
17 for being different. They know that trans people are often targets for violent crimes. The  
18 Executive Order may be interpreted by some as legitimizing and justifying this hatred and  
19 violence. They are terrified to lose access to gender-affirming care through medication that helps  
20 them feel like their bodies align with their gender identity. Child B is scared that she won’t be  
21 able to access estrogen, which has helped her feel so much better about herself. Child C, who is  
22 too young for hormones at this point, is afraid that hormones might not be available when they  
23 are old enough because of the Order. And Child A worries for her younger siblings and how they  
24 might be impacted by losing access to gender-affirming medical care.

25           10.      If my children are denied this care, my family has discussed contingency plans,  
26 including the possibility of moving to Canada and seeking healthcare in British Columbia. This

1 would be a very long process and a tremendous change for my children, as they would lose their  
2 current support system of friends, family, and community. We don't have the capacity to  
3 challenge the Executive Order ourselves; at this point, we are just trying to survive. It is  
4 exhausting to feel like I always have to be in defense mode for my children, constantly trying to  
5 figure out how to keep my family safe, how to create a life in which they can be happy and  
6 fulfilled. I don't want my children to be mistreated – I want them to live as themselves and to  
7 have fulfilling, authentic lives.

8 I declare under penalty of perjury under the laws of the State of Washington and the  
9 United States of America that the foregoing is true and correct.

10 DATED this \_\_\_\_ day of February 2025 at \_\_\_\_\_, Washington.

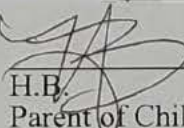
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12 H.B.

13 Parent of Child A, Child B, and Child C  
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10 DATED this 3<sup>rd</sup> day of February 2025 at Pierce County Washington.

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13 Parent of Child A, Child B, and Child C  
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